

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

RCRA Corrective Action

Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

Facility Name: American Recovery Company, Incorporated
Facility Address: 1901 Birch Street, Baltimore, MD 21226
Facility EPA ID #: MDD 07 492 3392

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

 X If yes - check here and continue with #2 below.
 If no - re-evaluate existing data, or
 If data are not available skip to #6 and enter "IN" (more information needed) status code.

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)

Page 2

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **“contaminated”**¹ above appropriately protective risk-based “levels” (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	<u>Yes</u>	<u>No</u>	<u>?</u>	<u>Rationale / Key Contaminants</u>
Groundwater	X			See below.
Air (indoors) ²		X		Site is abandoned; no indoor air exposures.
Surface Soil (e.g., <2 ft)	X			See below.
Surface Water		X		Stream data in Phase I Data Report 1/23/2002; Organic and inorganic constituents were not detected; low levels of a few inorganics detected.
Sediment		X		Sediment data in Phase I Data Report 1/23/02; concentrations < RBCs using residential exposure.
Subsurf. Soil (e.g., >2 ft)	X			See below.
Air (outdoors)		X		Given levels of contamination, exposure above a levels of concern is highly improbable.

—— If no (for all media) - skip to #6, and enter “YE,” status code after providing or citing appropriate “levels,” and referencing sufficient supporting documentation demonstrating that these “levels” are not exceeded.

X If yes (for any media) - continue after identifying key contaminants in each “contaminated” medium, citing appropriate “levels” (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

—— If unknown (for any media) - skip to #6 and enter “IN” status code.

Rationale and Reference(s): **Groundwater:** Groundwater is contaminated with several inorganic and volatile organic constituents above drinking water standards (i.e MCLs and tap water RBCs for those constituents without MCLs). Some of the key constituents (highest levels and/or broadest spatial extent) contaminating groundwater include: vinyl chloride; methylene chloride; 1,1,1 trichloroethane; cis 1,2 dichlorethene; benzene; trichloroethene; cadmium, chromium, copper, nickel and zinc.

Surface Soil: A significant amount of surface soil was removed during general cleanups and partial closures conducted at the facility during its operation between 1970 and 1984. These activities are described in American Recovery Company Curtis Bay Facility Closure and Post Closure Plan 1985. This Closure Plan also describes subsequent closure activities including removal of all areas of potential sources of contamination from the surface as well as grading and seeding of the site. Confirmatory sampling and analyses from these surface removals was limited and the site was subsequently leased for use as a junk yard. Consequently, there may be some limited remaining surface contamination.

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)

Page 3

Subsurface Soil: The 1985 Closure Plan recognized that residual soil contamination remains at the site. Contaminants identified in subsurface soil include: benzene, toluene, ethylbenzene, methylene chloride, chloroform, 1,1,1 trichloroethane, trichloroethylene, 1,2 dichloroethane, tetrachloroethane, PCBs and some heavy metals. As part of the Additional Groundwater and Surface Water Investigation performed in 2001, the facility analyzed subsurface soil at five locations. These five locations were collected from the portion of the site which detected the highest soil gas concentration during a soil gas survey performed in 1992. From those soil borings, the facility detected elevated (>residential risk based concentrations for direct exposure) concentrations for the following constituents: benzene; trichloroethene; tetrachloroethene; ethylbenzene; antimony, chromium.

Footnotes:

¹ “Contamination” and “contaminated” describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based “levels” (for the media, that identify risks within the acceptable risk range).

² Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)

Page 4

3. Are there **complete pathways** between “contamination” and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

<u>“Contaminated” Media</u>	Potential <u>Human Receptors</u> (Under Current Conditions)						
	Residents	Workers	Day-Care	Construction	Trespassers	Recreation	Food ³
Groundwater	No	No	No	No	No	No	No
Air (indoors)	---	---	---	---	---	---	---
Soil (surface, e.g., <2 ft)	No	No	No	No	No	No	No
Surface Water	---	---	---	---	---	---	---
Sediment	---	---	---	---	---	---	---
Soil (subsurface e.g., >2 ft)	No	No	No	No	No	No	No
Air (outdoors)	---	---	---	---	---	---	---

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors' spaces for Media which are not “contaminated” as identified in #2 above.
2. enter “yes” or “no” for potential “completeness” under each “Contaminated” Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential “Contaminated” Media - Human Receptor combinations (Pathways) do not have check spaces (“___”). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

X If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter “YE” status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

_____ If yes (pathways are complete for any “Contaminated” Media - Human Receptor combination) - continue after providing supporting explanation.

_____ If unknown (for any “Contaminated” Media - Human Receptor combination) - skip to #6 and enter “IN” status code.

Rationale and Reference(s): Groundwater: The facility is located in the City of Baltimore where public water supply is provided. Consequently there are no on-site or off-site users of groundwater.

Surface and Subsurface Soils: Currently the site is abandoned and has no on-going operations. The entire site is surrounded by a fence preventing trespassers from access to the site.

³ Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)

Page 5

4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **“significant”**⁴ (i.e., potentially “unacceptable” because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable “levels” (used to identify the “contamination”); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable “levels”) could result in greater than acceptable risks)?

_____ If no (exposures can not be reasonably expected to be significant (i.e., potentially “unacceptable”) for any complete exposure pathway) - skip to #6 and enter “YE” status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

_____ If yes (exposures could be reasonably expected to be “significant” (i.e., potentially “unacceptable”) for any complete exposure pathway) - continue after providing a description (of each potentially “unacceptable” exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to “contamination” (identified in #3) are not expected to be “significant.”

_____ If unknown (for any complete pathway) - skip to #6 and enter “IN” status code

Rationale and Reference(s): _____

⁴ If there is any question on whether the identified exposures are “significant” (i.e., potentially “unacceptable”) consult a human health Risk Assessment specialist with appropriate education, training and experience.

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)

Page 6

5. Can the “significant” **exposures** (identified in #4) be shown to be within **acceptable** limits?

_____ If yes (all “significant” exposures have been shown to be within acceptable limits) - continue and enter “YE” after summarizing and referencing documentation justifying why all “significant” exposures to “contamination” are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

_____ If no (there are current exposures that can be reasonably expected to be “unacceptable”)- continue and enter “NO” status code after providing a description of each potentially “unacceptable” exposure.

_____ If unknown (for any potentially “unacceptable” exposure) - continue and enter “IN” status code.

Rationale and Reference(s): _____

Current Human Exposures Under Control
Environmental Indicator (EI) RCRIS code (CA725)

Page 7

6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

 X Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the **American Recovery Company, Incorporated** facility, EPA ID # **MDD 07 492 3392**, located at **1901 Birch Street, Baltimore, MD 21226** under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.

 NO - "Current Human Exposures" are NOT "Under Control."

 IN - More information is needed to make a determination.

Completed by (signature) _____ Date 09/17/02
 (print) Deborah Goldblum
 (title) Remedial Project Manager

Supervisor (signature) _____ Date 09/19/02
 (print) Robert E. Greaves
 (title) Chief, General Operations Branch
 (EPA Region or State) EPA, Region 3

Locations where References may be found: EPA Region III - 1650 Arch Street, Phila., PA 19103-2029

Contact telephone and e-mail numbers:

(name) Deborah Goldblum
(phone #) 215-814-3432
(e-mail) goldblum.deborah@epa.gov

FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.